

1 FRANK BELL, CSBN 038955
A Law Corporation
2 333 Bradford Street, Suite 270
Redwood City, California 94063
3 Tel: (650) 365-8300
Fax: (650) 366-8987

4 Attorney for Defendant
5 JOHN WAYNE PRICE
6
7
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,

No. CR 12-0061 EMC (MEJ)

14 APPLICATION AND ~~[PROPOSED]~~
ORDER FOR ELIMINATION OF
CURFEW

15 v.

16 JOHN WAYNE PRICE,
17 Defendant.
_____ /

18 Comes now defendant, JOHN WAYNE PRICE, by and through
19 his counsel, and said defendant requests the elimination of
20 the curfew requirement imposed by the court at the time of
21 his release.

22 Defendant was released on February 14, 2012 on a
23 \$75,000.00 bond secured by the signatures of his two sisters
24 and his former wife, Tylene Leslie. He has been supervised
25 by Pretrial Services since that date. He has been in
26 compliance with all of the terms and conditions so far as
27

28 APP AND ~~[PROPOSED]~~ ORDER FOR ELIM OF CURFEW

1 counsel is aware.

2 Defendant has a business of home repair and
3 refurbishment in the City of Tracy area along with his
4 former wife, Tylenne Leslie, who is one of his sureties. Ms
5 Leslie resides in Tracy and she is his business manager.
6 She arranges for his work and his schedule. Most of these
7 jobs are located in the Eastern District of California in
8 the Tracy area.

9 Moreover, defendant has a young son who has serious
10 health issues who lives in Stockton, California, which is in
11 the Eastern District of California and other seven
12 (7) children for whom he is responsible, one of which also
13 lives in the Eastern District, and with whom he visits.
14 Although the pretrial officer has granted some minor
15 modifications allowing for an extension for a day or two
16 until 10:00 p.m. this has to be done many days in advance or
17 order to receive a call back and approval.

18 Defendant requests that the court approve the
19 elimination of the curfew on Mr. Price. Mr. Price is
20 supervised by Pretrial Services Officer, Gelareh Farahmand

21 //////////////

22 //////////////

23 //////////////

24 //////////////

25 //////////////

26 //////////////

(408) 535-5584, who has indicated to Mr. Price that the elimination of the curfew is for the court.

Dated: June 11, 2012

/S/ _____
FRANK BELL
Attorney for Defendant
JOHN WAYNE PRICE

IT IS SO ORDERED:

Dated: June 14, 2012

